

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

CAITLIN O’CONNOR,	)	
	)	Case No. 3:20-cv-00628
Plaintiff,	)	
	)	District Judge Richardson
v.	)	
	)	Magistrate Judge Frensley
THE LAMPO GROUP, LLC,	)	
	)	Jury Demand
Defendant.	)	

**DEFENDANT’S MOTION TO EXTEND DEADLINE  
TO RESPOND TO PLAINTIFF’S MOTION TO SEAL**

Defendant, The Lampo Group, LLC, by and through the undersigned counsel, moves the Court to extent its deadline to respond to Plaintiff’s Motion to Seal (Doc. #73) by one day to Tuesday, January 4, 2022. In support of this motion, Defendant states the following:

1. This case involves a large volume of highly sensitive information, including information regarding the personal lives of third parties.
2. To facilitate discovery in this case, the Court entered an Amended Confidentiality Order (Docs. #45-1, 46).
3. Most of the documents produced by Defendant in this case have been designated as Confidential or Attorney’s Eyes Only pursuant to the Amended Confidentiality Order.
4. On November 9, 2021, Defendant moved the Court for summary judgment (Doc. #66).
5. On December 17, 2021, Plaintiff filed a response in opposition to Defendant’s Motion for Summary Judgment (Doc. #74).
6. Plaintiff also filed numerous deposition transcripts, deposition exhibits, and other

documents in support of her opposition to Defendant's Motion for Summary Judgment (Doc. #76).

7. Most of the deposition transcripts, exhibits, and documents filed by Plaintiff have been designated as Confidential or Attorney's Eyes Only by Defendant pursuant to the Amended Confidentiality Order.
8. Plaintiff filed her opposition brief and all of these documents under seal pursuant to the Local Rule 5.03, the Amended Confidentiality Order, and the Court's Order dated November 24, 2021 (Doc. #71).
9. Defendant has diligently worked to review all of the documents filed by Plaintiff under seal, determine which it believes should remain sealed in whole or in part, prepare a response brief justifying the sealing, and preparing redacted copies of documents that Defendant believes can be filed publicly in part.
10. Defendant's response to Plaintiff's Motion to Seal is due today, January 3, 2022, as was Defendant's reply brief and response to Plaintiff's Statement of Additional Facts (Doc. #75).
11. Due to the these overlapping filing deadlines, intervening holidays, and Defendants' attorneys being ill, Defendant requests an additional day to file its response to Plaintiff's Motion to Seal. This extension will not impact any dispositive motion deadlines (Defendant's Motion for Summary Judgment is now fully briefed) or trial.

In light of the foregoing, Defendant moves the Court to extend its deadline to respond to Plaintiff's Motion to Seal (Doc. #73) by one day to January 4, 2022.

Respectfully submitted,

/s/Daniel Crowell

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*Attorneys for Defendant*

**CERTIFICATE OF SERVICE**

I certify that, on January 3, 2022, I filed *Defendant's Motion to Extend Deadline to Respond to Plaintiff's Motion to Seal* via the Court's electronic filing system, which will automatically notify and send a copy of that filing to:

Heather Moore Collins  
Anne Bennett Hunter  
Ashley Shoemaker Walter  
Collins & Hunter PLLC

*Attorneys for Plaintiff*

/s/Daniel Crowell

Daniel Crowell (TN #31485)  
*Attorney for Defendant*